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September 28, 2017

Mr. Samuel Unger, Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 W. 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Attention: Renee Purdy / Ivar Ridgeway

Dear Mr. Unger:

**CITY OF LOS ANGELES REQUEST FOR TIME EXTENSION OF THE 31% INTERIM  
MILESTONE CONTAINED IN THE UPPER LOS ANGELES RIVER ENHANCED  
WATERSHED MANAGEMENT PROGRAM**

The approved Upper Los Angeles River Enhanced Watershed Management Program (ULAR EWMP) includes a 31 % milestone for the Los Angeles River Metals TMDL in the watershed by 2017. The 31% milestone for 2017 was created as an ULAR EWMP milestone because the Permit required milestones be developed if not specified in the Permit for the current Permit term. The Los Angeles River Metals TMDL specifies a 25% milestone in 2012 and 50% milestone in 2024.

The complimentary document of the ULAR EWMP is the Coordinated Integrated Monitoring Program (ULAR CIMP) which was approved by your office on November 18, 2015. Monitoring, which includes receiving water, of the ULAR watershed area has been ongoing since that time with encouraging results as they pertain to the pollutant trends coming off the watershed area. It should be noted that the watershed management group's receiving water station at Los Angeles River Reach 4 at Tujunga Avenue (Site ID: LAR\_04\_TUJ) which represents 38% of the total drainage area for the ULAR watershed during the 2015-2016 monitoring year generated no exceedances for metals. This would demonstrate the watershed group is meeting the 2017 31% milestone for metals and will be documented in the forthcoming December 2017 Permit Annual Report.



The City of Los Angeles is requesting a phase extension approach to meet the required total BMP volume capacity of 119 acre feet that is now required by December 2017 in the ULAR EWMP (See Figures 7.5 and 7.6). The phase one extension would be to December 2021 to complete 80 acre feet and the phase two extension would be to December 2024 to complete the remaining 39 acre feet.

Though the City understands the permit allows for various means to show compliance, and monitoring data shows the watershed has met the 2017 31% metals milestone, the requested time extensions would allow for flexibility as to how the City schedules projects moving forward. The City is sharing with you the list of projects (see Attachment A) it intends to pursue and their status. The first 18 water quality projects shown on the list are in construction or are being designed presently, demonstrating the City's commitment in achieving the objectives of the EWMP. The City along with the other ULAR EWMP watershed members will be using the upcoming adaptive management process in 2018 to update the ULAR EWMP to reflect the updated scheduling of projects to achieve the future milestones. Moreover, as part of future adaptive management processes, the Reasonable Assurance Analysis will be revisited to incorporate the most recent monitoring data and implementation efforts from the group to ensure the most accurate volume capture is being realized to ensure milestone compliance but also adjust volume capture quantities to match conditions at the time. The appropriate sections of the ULAR EWMP will be revised accordingly at each iteration of the adaptive management process.

If you have any questions about this request or wish to discuss this further please contact me at (213) 485-0587 or [Shahram.Kharaghani@lacity.org](mailto:Shahram.Kharaghani@lacity.org) or your staff may contact Alfredo Magallanes at (213) 485-3958 or [Alfredo.Magallanes@lacity.org](mailto:Alfredo.Magallanes@lacity.org).

Sincerely,



FOR  
SHAHRAM KHARAGHANI, PhD, PE, BCEE  
Program Manager

SK:AM:am  
WPDCR9384

Attachment

cc: Adel Hagekhalil, City of Los Angeles, LASAN  
Alfredo Magallanes, City of Los Angeles, LASAN

## ATTACHMENT A

No.	Project Name / (Community Location)	Status
1	Sun Valley EDA Public Improvement Project	Construction
2	Albion Riverside Dairy Park	Construction
3	Great Street (CD 2) - Lankershim Blvd (Chandler Blvd to Victory Blvd)	Design
4	Great Street (CD 7) - Van Nuys Blvd (Laurel Canyon Blvd to San Fernando)	Design
5	Rory M. Shaw Wetlands Park (Strathern Pit Multiuse Project)	Design
6	Whitnall Gardens Stormwater Capture (LADWP)	Design
7	Whitnall Hwy Stormwater Infiltration Project	Design
8	Aliso Creek - Limekiln Creek Restoration	Design
9	2nd Street/LA River Removal & Reuse Urban Flow System – Phase II (aka LAR Segment B Urban Runoff Project No. 1)	Funded GF FY17/18 - Pre-design
10	Palmetto Street/LA River Removal & Reuse Urban Flow System – Phase I (aka LAR Segment B Urban Runoff Project No. 2)	Funded GF FY17/18 - Pre-design
11	Mission Rd/LA River Removal & Reuse Urban Flow System (aka LAR Segment B Urban Runoff Project No. 3)	Funded GF FY17/18 - Pre-design
12	Sycamore Grove Park Stormwater Enhancement (aka Arroyo Seco Urban Runoff Project No. 1)	Funded GF FY17/18 - Pre-design
13	Herman Dog Park Stormwater Enhancement (aka Arroyo Seco Urban Runoff Project No. 2)	Funded GF FY17/18 - Pre-design
14	G2 Parcel Development	Funded - BOE Interim Use Design
15	Agnes Ave (Vanowen St to Kittridge St)	Funded thru construction - Concept Report Phase
16	Branford Street Stormwater Infiltration - Laurel Canyon to Pacoima Wash	Funded thru construction - Concept Report Phase
17	Glenoaks and Filmore	Funded thru construction - Concept Report Phase
18	Great Street Van Nuys Blvd (Laurel Canyon to San Fernando)	Funded thru construction - Concept Report Phase
19	Great Street Lankershim Blvd (Chandler to Victory)	Funded thru construction - Concept Report Phase
20	Victory Blvd/Wilbur Ave LRS LAR-E-058	Seeking Funding - Planning Phase LRS
21	DeSoto Ave/Van Owen St LRS LAR-E-096	Seeking Funding - Planning Phase LRS
22	Winnetka Ave/LA River LRS LAR-E-081	Seeking Funding - Planning Phase LRS
23	White Oake Ave/LA River LRS LAR-E-021	Seeking Funding - Planning Phase LRS
24	Canoga Ave/Van Owen LRS LAR-E-110	Seeking Funding - Planning Phase LRS
25	DeSoto Ave/Bassett St LRS LAR-E-097	Seeking Funding - Planning Phase LRS
26	19945 Haynes St LRS LAR-E-077	Seeking Funding - Planning Phase LRS
27	6564 Reseda Blvd LRS LAR-E-048	Seeking Funding - Planning Phase LRS
28	Tampa Ave/Victory Blvd LRS LAR-E-065	Seeking Funding - Planning Phase LRS
29	Bradley Green Alley	Seeking Funding - Planning Phase
30	Canterbury Power Line Easement Greenway	Seeking Funding - Planning Phase
31	East Valley Baseball Park	Seeking Funding - Planning Phase
32	Fernangeles Park	Seeking Funding - Planning Phase
33	Lopez Canyon Landfill Canyon Debris Basin	Seeking Funding - Planning Phase

No.	Project Name / (Community Location)	Status
34	Los Angeles River Street Ends Stormwater Infiltration	Seeking Funding - Planning Phase
35	Strathern Park Infiltration System	Seeking Funding - Planning Phase
36	Terra Bella Street Widening Greening 1	Seeking Funding - Planning Phase
37	Whitsett Sports Field	Seeking Funding - Planning Phase
38	4th St & Santa Fe Priority Greenway + Sustainable Little Tokyo	Seeking Funding - Planned (EWMP Regional)
39	Chase St. Priority Greenway + Bull Creek Park	Seeking Funding - Planned (EWMP Distributed)
40	Sheldon St. Priority Greenway	Seeking Funding - Planned (EWMP Distributed)
41	Upgrades to Pump Plant 621 and Associated Stormwater Treatment Opportunities	Seeking Funding - Planned (EWMP Distributed)
42	Upgrades to Pump Plant 622 and Associated Stormwater Treatment Opportunities	Seeking Funding - Planned (EWMP Distributed)
43	Northeast Los Angeles EWMP Regional Project 1	Seeking Funding - Planned (EWMP Distributed)
44	Southeast Los Angeles EWMP Project 1	Seeking Funding - Planned (EWMP Distributed)
45	Sunland EWMP Regional Project 1	Seeking Funding - Planned (EWMP Distributed)
46	Sunland EWMP Regional Project 2	Seeking Funding - Planned (EWMP Distributed)
47	Sun Valley EWMP Regional Project 1	Seeking Funding - Planned (EWMP Distributed)
48	Sun Valley EWMP Regional Project 2	Seeking Funding - Planned (EWMP Distributed)
49	Granada Hills EWMP Regional Project 1	Seeking Funding - Planned (EWMP Distributed)
50	Boyle Heights EWMP Regional Project 1	Seeking Funding - Planned (EWMP Distributed)
51	Boyle Heights EWMP Regional Project 2	Seeking Funding - Planned (EWMP Distributed)
52	Northridge EWMP Regional Project 1	Seeking Funding - Planned (EWMP Distributed)
53	Northridge EWMP Regional Project 2	Seeking Funding - Planned (EWMP Distributed)
54	Boyle Heights EWMP Regional Project 3	Seeking Funding - Planned (EWMP Distributed)
55	Northeast Los Angeles EWMP Regional Project 5	Seeking Funding - Planned (EWMP Distributed)
56	Northeast Los Angeles EWMP Regional Project 8	Seeking Funding - Planned (EWMP Distributed)
57	Northeast Los Angeles Green Street Project 1	Seeking Funding - Planned (EWMP Distributed)
58	Boyle Heights Green Streets Project 1	Seeking Funding - Planned (EWMP Distributed)
59	Boyle Heights Green Streets Project 2	Seeking Funding - Planned (EWMP Distributed)
60	South Los Angeles Green Streets Project 5	Seeking Funding - Planned (EWMP Distributed)
61	Silver Lake Green Streets Project 3	Seeking Funding - Planned (EWMP Distributed)
62	Northeast Los Angeles Green Street Project 3	Seeking Funding - Planned (EWMP Distributed)
63	Northeast Los Angeles Green Street Project 4	Seeking Funding - Planned (EWMP Distributed)
64	Southeast Los Angeles Green Street Project 2	Seeking Funding - Planned (EWMP Distributed)
65	Southeast Los Angeles Green Street Project 3	Seeking Funding - Planned (EWMP Distributed)
66	Southeast Los Angeles Green Street Project 4	Seeking Funding - Planned (EWMP Distributed)
67	Southeast Los Angeles Green Street Project 5	Seeking Funding - Planned

No.	Project Name / (Community Location)	Status
		(EWMP Distributed)
68	Northeast Los Angeles Green Street Project 6	Seeking Funding - Planned (EWMP Distributed)
69	Northeast Los Angeles Green Street Project 7	Seeking Funding - Planned (EWMP Distributed)
70	Southeast Los Angeles Green Street Project 6	Seeking Funding - Planned (EWMP Distributed)
71	Canoga Park Green Streets Project 1	Seeking Funding - Planned (EWMP Distributed)
72	Arleta Green Streets Project 1	Seeking Funding - Planned (EWMP Distributed)
73	Encino Green Street Project 1	Seeking Funding - Planned (EWMP Distributed)
74	Canoga Park Green Streets Project 2	Seeking Funding - Planned (EWMP Distributed)
75	Sherman Oaks Green Street Project 1	Seeking Funding - Planned (EWMP Distributed)
76	Encino Green Street Project 2	Seeking Funding - Planned (EWMP Distributed)
77	Sherman Oaks Green Street Project 2	Seeking Funding - Planned (EWMP Distributed)
78	Encino Green Street Project 3	Seeking Funding - Planned (EWMP Distributed)
79	Arleta Green Streets Project 2	Seeking Funding - Planned (EWMP Distributed)
80	Arleta Green Streets Project 3	Seeking Funding - Planned (EWMP Distributed)
81	Sunland Green Street Project 1	Seeking Funding - Planned (EWMP Distributed)
82	Arleta Green Streets Project 4	Seeking Funding - Planned (EWMP Distributed)
83	Encino Green Street Project 4	Seeking Funding - Planned (EWMP Distributed)
84	Sunland Green Street Project 2	Seeking Funding - Planned (EWMP Distributed)
85	Arleta Green Streets Project 5	Seeking Funding - Planned (EWMP Distributed)
86	Sherman Oaks Green Street Project 3	Seeking Funding - Planned (EWMP Distributed)
87	Reseda Green Street Project 1	Seeking Funding - Planned (EWMP Distributed)
88	Sun Valley Green Street Project 1	Seeking Funding - Planned (EWMP Distributed)
89	Reseda Green Street Project 2	Seeking Funding - Planned (EWMP Distributed)
90	North Hollywood Green Street Project 1	Seeking Funding - Planned (EWMP Distributed)
91	Sherman Oaks Green Street Project 4	Seeking Funding - Planned (EWMP Distributed)
92	Sunland Green Street Project 3	Seeking Funding - Planned (EWMP Distributed)
93	Sun Valley Green Street Project 2	Seeking Funding - Planned (EWMP Distributed)
94	Sunland Green Street Project 4	Seeking Funding - Planned (EWMP Distributed)
95	Arleta Green Streets Project 6	Seeking Funding - Planned (EWMP Distributed)
96	North Hollywood Green Street Project 2	Seeking Funding - Planned (EWMP Distributed)
97	Sunland Green Street Project 5	Seeking Funding - Planned (EWMP Distributed)
98	Sun Valley Green Street Project 3	Seeking Funding - Planned (EWMP Distributed)
99	Sherman Oaks Green Street Project 5	Seeking Funding - Planned (EWMP Distributed)
100	Sunland Green Street Project 6	Seeking Funding - Planned (EWMP Distributed)

No.	Project Name / (Community Location)	Status
101	Sunland Green Street Project 7	Seeking Funding - Planned (EWMP Distributed)
102	Sunland Green Street Project 8	Seeking Funding - Planned (EWMP Distributed)
103	Van Nuys Green Streets Project 1	Seeking Funding - Planned (EWMP Distributed)
104	Sun Valley Green Street Project 4	Seeking Funding - Planned (EWMP Distributed)
105	Sunland Green Street Project 9	Seeking Funding - Planned (EWMP Distributed)
106	Canoga Park Green Streets Project 3	Seeking Funding - Planned (EWMP Distributed)
107	Sun Valley Green Street Project 7	Seeking Funding - Planned (EWMP Distributed)
108	Van Nuys Green Streets Project 2	Seeking Funding - Planned (EWMP Distributed)
109	Mission Hills Green Street Project 1	Seeking Funding - Planned (EWMP Distributed)
110	Canoga Park Green Streets Project 4	Seeking Funding - Planned (EWMP Distributed)
111	Canoga Park Green Streets Project 5	Seeking Funding - Planned (EWMP Distributed)
112	North Hollywood Green Street Project 4	Seeking Funding - Planned (EWMP Distributed)